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PASTOR, BEHLING & WHEELER, LLC
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August 11, 2010
(PBW Project No. 1352)

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Advance Notice of Baseline Ecological Risk Assessment Field Activities, Gulfco Marine
Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 55 of the amended Unilateral Administrative Order for the subject site (the Site), effective January 31, 2008 (the amended UAO), this letter has been prepared to provide advance notice of Baseline Ecological Risk Assessment (BERA) field activities to be performed as part of the Remedial Investigation/Feasibility Study (RI/FS) at the Site. The proposed activities, which are described in the Final BERA Work Plan & Sampling and Analysis Plan (WP-SAP) dated June 22, 2010 (approved by your letter of August 4, 2010), will be initiated on August 12, 2010. The work will be performed by Benchmark Ecological Services, Inc. (BESI), a subcontractor to Pastor, Behling & Wheeler, LLC (PBW), on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow), collectively the Gulfco Restoration Group (the Group).

In order to allow the Group to meet the schedule provided in the Final BERA WP-SAP, we respectfully request that you waive the 14-day advance notice specified in Paragraph 55 of the amended UAO and allow the work to begin on August 12, 2010. Also, in order to facilitate meeting the above schedule, we request your approval of the following adjustments to procedures specified in the BERA WP-SAP based on input from BESI, who will be collecting the samples:

- Sediment pore water samples – We would like to use a grab sampler (e.g., Ekman) instead of a piston corer, as described in the WP-SAP. This approach will be consistent with the collection of bulk sediment for laboratory analyses and toxicity testing (and will also significantly shorten the associated sampling schedule for pore water).
- Timing of sediment samples – We would like to collect bulk sediment samples for laboratory analyses and toxicity testing prior to sampling of sediment for pore water extraction rather than simultaneously collecting the samples as described in the WP-SAP. We will stake the sample locations where possible, and will use a differential (sub meter accuracy) Trimble GPS unit to allow us to return to the sediment sample locations for the



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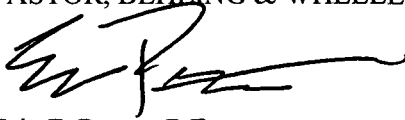
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pore water sampling. This approach will allow the 28-day whole sediment toxicity tests to begin as soon as possible.

Thank you for the opportunity to submit this information. Please let us know as soon as possible if we may proceed with the proposed schedule and modifications.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Ms. Luda Voskov - Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Ray Merrell – Sequa Corporation
Mr. Donnie Belote – The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP
Mr. David Lingle – URS Corporation
Dr. William Quast - BESI

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